

PHILIP J. TRENCHAK, ESQ.  
Nevada State Bar No. 9924  
Mullins & Trenchak, Attorneys at Law  
1614 S. Maryland Parkway  
Las Vegas, Nevada 89104  
P: (702) 778-9444  
F: (702) 778-9449  
E: phil@mullinstrenchak.com  
*Attorneys for Plaintiffs Justin Hymes, Kathy Wadkins, Michael Bates,  
Curtis Lux, Ishmel Byrd, Aaron Mathis, & Rick Gordon*

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

CASE NO.: 2:23-cv-00839-MMD-NJK

CURTIS LUX, an individual;  
JUSTIN HYMES, an individual;  
KATHY WADKINS, an individual;  
MICHAEL BATES, an individual;  
AARON MATHIS, an individual;  
RICK GORDON, an individual;  
ISHMEL BYRD, an individual;

Plaintiffs,

vs.

JORDANA BUCHANAN, an individual;  
ZACHARY BUCHANAN, an individual;  
ALLAN BENAVIDES, a.k.a. ALLAN  
GLICKSTEIN, an individual;  
LILLIBETH BENAVIDES, an individual;  
SOUTHWEST CONCRETE PUMPING, LLC, a  
Nevada Limited Liability Company;  
AEB ENTERPRISES, LLC, a Nevada Domestic  
Limited Liability Company;  
ACJ CONSULTING, LLC, A Nevada Domestic  
Limited Liability Company;  
TOP WATER HOLDINGS, LLC, a Nevada  
Domestic Limited Liability Company;  
DOES I-X, unknown individuals;  
ROES I-X, unknown corporate entities and/or  
business entities;

Defendants.

**STIPULATION TO EXTEND PLAINTIFFS'  
TIME TO RESPOND TO DEFENDANT'S  
MOTION TO DISMISS (ECF 31) FROM  
OCTOBER 30, 2023 to OCTOBER 31, 2023  
(Third Request)**

Plaintiffs CURTIS LUX, JUSTIN HYMES, KATHY WADKINS, AARON MATHIS, RICK  
GORDON, MICHAEL BATES, and ISHMEI BYRD by and through their attorney PHILIP J.

TRENCHAK hereby Stipulate with Defendants JORDANA BUCHANAN, an individual; ZACHARY BUCHANAN, an individual; ALLAN BENAVIDES, an individual; LILLIBETH BENAVIDES, an individual; SOUTHWEST CONCRETE PUMPING, LLC, a Nevada Limited-Liability Company, AEB ENTERPRISES, LLC, a Nevada Domestic Limited Liability Company; ACJ CONSULTING, LLC, A Nevada Domestic Limited Liability Company; TOP WATER HOLDINGS, LLC, a Nevada Domestic Limited Liability Company, by and through their Counsel, Jeffrey D. Winchester of Lewis Brisbois Bisgaard & Smith LLP to stipulate to extend the time Plaintiff has to Respond to Defendants Motion to Dismiss (ECF 31) from October 30, 2023 until October 31, 2023.

**IT IS SO STIPULATED.**

DATED this 30<sup>th</sup> day of October, 2023  
**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

/s/ Jeffrey Winchester  
Jeffrey D. Winchester  
Nevada Bar No. 10279  
Email: jeffrey.winchester@lewisbrisbois.com  
Jessica L. Beeler  
Nevada Bar No. 15387  
Email: jessica.beeler@lewisbrisbois.com  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
*Attorney for Defendants*  
Southwest Concrete Pumping, LLC; Jordana  
Buchanan; Zachary Buchanan; Top Water  
Holdings, LLC; Lillibeth Benavides; AEB  
Enterprises, LLC; ACJ Consulting, LLC;  
Allan Benavides

DATED this 30<sup>th</sup> day of October, 2023  
**MULLINS & TRENCHAK,  
ATTORNEYS AT LAW**

/s/ Philip J. Trenchak  
Philip J. Trenchak, Esq.  
Nevada Bar No. 9924  
Email: phil@mullinstrenchak.com  
1614 S. Maryland Pkwy.  
Las Vegas, Nevada 89104  
*Attorneys for Plaintiffs*

**ORDER**

**IT IS SO ORDERED.**

DATED: October 31, 2023



UNITED STATES DISTRICT JUDGE